STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION

| Ameren Illinois Company |) | |
|--------------------------------------|---|------------------------|
| d/b/a Ameren Illinois |) | |
| |) | ICC Docket No. 11-0282 |
| Proposed General Increase in Natural |) | |
| Gas Rates | j | |

VERIFIED PETITION TO INTERVENE ON BEHALF OF INTERSTATE GAS SUPPLY OF ILLINOIS, INC.

Interstate Gas Supply of Illinois, Inc. ("IGS"), by and through its attorneys, DLA Piper LLP (US), pursuant to 83 Illinois Administrative Code Section 200.200, hereby petitions the Illinois Commerce Commission ("Commission" or "ICC") for leave to intervene in the above-captioned proceeding and, in support of this Petition, states as follows:

- 1. IGS is an alternative retail gas supplier ("ARGS") that is certified to provide natural gas in the Ameren Illinois Company ("Ameren") service territory. In that capacity, IGS participates in the competitive gas market.
- 2. On or about February 18, 2011, Ameren filed with the Commission tariff sheets.

 On March 23, 2011, the Commission initiated the instant proceeding by entering an Order suspending the Ameren proposed tariff revisions.
- 3. IGS wishes to participate as an active party in the instant proceeding, to present its position on the issues, and to make recommendations regarding Ameren's proposed tariff sheets. As current participants in the Illinois gas market, IGS and its customers will be directly impacted by Ameren's proposed changes in rates and charges, and have a substantial interest in how any Order entered by the Commission in this proceeding may impact the development of competition in the Ameren's service territory.

- 4. No other party in this proceeding can adequately represent the interests of IGS, and the granting of the instant Petition to Intervene will not delay this proceeding
- 5. IGS agrees to accept service by electronic means as provided for in Section 200.1050 of the Commission's Rules of Practice. (83 Adm. Code 200.1050.) Please include on the service list the following representatives of IGS:

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WHEREFORE, the IGS respectfully requests that the Commission grant leave to intervene and participate in this proceeding to IGS, and that the Commission grant such further additional relief as it deems appropriate.

Dated: April 8, 2011

Respectfully submitted,

INTERSTATE GAS SUPPLY OF ILLINOIS, INC.

By: <u>/s/ Christopher J. Townsend</u> One Of Its Attorneys

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